

**IN THE UNITED STATES DISTRICT COURT
FOR SOUTH DAKOTA**

RELIANCE TELEPHONE OF GRAND
FORKS INCORPORATED,
a North Dakota corporation,

and

RELIANCE SYSTEMS INC.,
a Nevada corporation,

Plaintiffs,

v.

YANKTON COUNTY, SOUTH DAKOTA,

and

NETWORK COMMUNICATIONS
INTERNATIONAL CORP.,

Defendants.

Civil No. 4:24-cv-04098-ECS

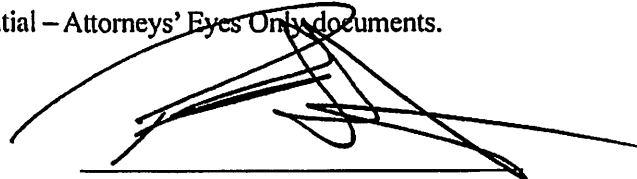
**JOINT MOTION TO AMEND
STIPULATED PROTECTIVE ORDER**

Plaintiffs Reliance Telephone of Grand Forks Incorporated and Reliance Systems Inc. (collectively, “the Plaintiffs”), Defendant Yankton County, South Dakota (“Yankton”), and Defendant Network Communications International Corporation (“NCIC”) (collectively, “the Defendants”) (collectively the “Parties”), through their attorneys, hereby stipulate and jointly move the Court to amend the Stipulated Protective Order in this action (Docs. 59 and 61) to add an additional confidential designation level to control the exchange and discovery of highly confidential financial and proprietary business information. Upon joint agreement of the Parties for an order pursuant to Fed. R. Civ. P. 26(c) that confidential information be disclosed only in designated ways, the Parties hereby agree and stipulate to amend the Stipulated Protective Order to add the following paragraphs:

16. “Confidential Attorneys’ Eyes Only” Designation. The parties shall have the right to further designate Confidential documents or portions of documents as “Confidential – Attorneys’ Eyes Only” where they reflect trade secrets, highly sensitive financial information, proprietary information, ongoing business development materials, highly confidential business information, or technological design information that is of such a sensitive and proprietary nature that disclosure must be protected, strictly limited, and used only as set forth in paragraph 3 of this Protective Order. The “Confidential – Attorneys’ Eyes Only” designation is to be used in good faith.

17. Access to any Confidential – Attorneys’ Eyes Only documents shall be limited to individuals and entities identified in Paragraph 4(a), (b), (c), (d), (f), (g), (h), and (i) of the Protective Order (Doc. 61). In addition, any other person agreed upon by the parties in writing who signs a Written Assurance may have access to Confidential – Attorneys’ Eyes Only documents.

Dated: May 21, 2025.



Patrick L. Sealey AT0007085
HEIDMAN LAW FIRM, P.L.L.C.
1128 Historic Fourth Street
P.O. Box 3086
Sioux City, IA 51102
Phone: (712) 255-8838
Fax: (712) 258-6714
Email: Patrick.Sealey@heidmanlaw.com

and

Alan M. Anderson (MN Bar #149500)
(admitted *pro hac vice*)
L. Reagan Florence (MN Bar #0396468)
(admitted *pro hac vice*)
ALAN ANDERSON LAW FIRM LLC
11100 Wayzata Blvd., Suite 545
Minneapolis, MN 55305
Tel: 612-756-7010

*Attorneys for Plaintiff Reliance Telephone of
Grand Forks Incorporated and Reliance
Systems Inc.*

Dated: May 29 2025.

/s/ 

#4650 Dylan M. Miller – SDBA
#5439 Marlow, Woodward & Huff,
Prof. LLC PO Box 667, 200 W.
Third St. Yankton, SD 57078
Telephone: (605) 665-5009
Facsimile: (605) 665-4788
Email: nick@mwhlawyers.com;
dylan@mwhlawyers.com

*Attorneys for Defendant Network
Communications International Corp.*

Dated: May ____ 2025.

/s/ _____

Melissa R. Jelen
Claire E. Wilka
Cadwell Sanford Deibert & Garry
LLP 200 E 10th Street Suite 200
Sioux Falls, SD 57104
Ph: (605) 336-0828
Email: mjelen@cadlaw.com;
cwilka@cadlaw.com

*Attorneys for Defendant Yankton County,
South Dakota*

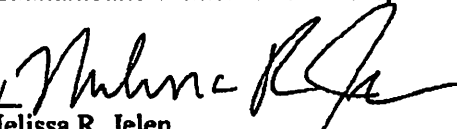
*Attorneys for Plaintiff Reliance Telephone of
Grand Forks Incorporated and Reliance
Systems Inc.*

Dated: May ___ 2025.

/s/
#4650 Dylan M. Miller – SDBA
#5439 Marlow, Woodward & Huff,
Prof. LLC PO Box 667, 200 W.
Third St. Yankton, SD 57078
Telephone: (605) 665-5009
Facsimile: (605) 665-4788
Email: nick@mwhlawyers.com;
dylan@mwhlawyers.com

*Attorneys for Defendant Network
Communications International Corp.*

Dated: May 27 2025.

/s/ 
Melissa R. Jelen
Claire E. Wilka
Cadwell Sanford Deibert & Garry
LLP 200 E 10th Street Suite 200
Sioux Falls, SD 57104
Ph: (605)336-0828
Email: mjelen@cadlaw.com;
cwilka@cadlaw.com

*Attorneys for Defendant Yankton County,
South Dakota*